

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|---|---|
| Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA ECF

June 2, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), with the consent of the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI"), write to request an extension of the deadlines for further briefing on Plaintiffs' Second Motion to Compel Directed to the FBI, and the FBI's Motion for a Protective Order.

As the Court will recall, the parties submitted a letter on May 15, 2020, presenting a proposed schedule for further briefing on the motions. ECF No. 6213. That letter noted that the parties had discussed the potential "that logistical challenges of the present moment may require" extensions of the deadlines proposed in the letter. In light of those logistical challenges and intervening developments, an extension of the deadline for Plaintiffs' Reply Brief in Support of their Second Motion to Compel and Opposition to the FBI's Motion for Protective Order is in fact needed. Accordingly, the PECs respectfully request that the Court endorse the following revised briefing schedule:

1. Plaintiffs' Opposition to the FBI's Cross Motion for Protective Order and Reply in Support of their Motion to Compel to be filed on or before June 19, 2020; and
2. The FBI's Reply Brief in Support of its Cross Motion for a Protective Order to be filed on or before July 17, 2020.

Honorable Sarah Netburn
June 2, 2020

We thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian

Steven R. Pounian
Andrew J. Maloney
Kreindler & Kreindler LLP
750 Third Avenue
New York, NY 10017
Tel: 212-687-8181
E-mail: spounian@kreindler.com

MOTLEY RICE LLC

By: /s/ Robert T. Haefele

Robert T. Haefele
Motley Rice LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel: (843) 216-9184
E-mail: rhaefele@motleyrice.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter
Cozen O'Connor
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2105
E-mail: scarter1@cozen.com

*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*